

**IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF MISSOURI
SOUTHEASTERN DIVISION**

AUTO-OWNERS INSURANCE,)	
)	
Plaintiff,)	Case No. 1:19-cv-00066-SNLJ
)	
v.)	
)	
BLAIR LEASING, LLC,)	
)	
Defendant.)	

BLAIR LEASING, LLC,)	
)	
Counter-Plaintiff,)	
)	
v.)	
)	
AUTO-OWNERS INSURANCE,)	
)	
Counter-Defendant.)	

JOINT MOTION TO EXTEND DISCOVERY DEADLINE

COME NOW the parties, Plaintiff and Counter-Defendant Auto Owners Insurance Company (“Plaintiff”) and Defendant and Counter-Plaintiff, Blair Leasing, LLC (“Defendant”), and hereby submit the foregoing Joint Motion to Extend Discovery Deadline (“Motion”) and in support thereof, state the following:

1. On June 30, 2020 Defendant Blair Leasing filed an unopposed Motion to extend the discovery deadline to complete two (2) depositions and address a pending discovery matter; specifically, the depositions of Auto-Owners’ corporate representative and claim representative and supplemental discovery outlined in a June 16, 2020 good faith letter. *See* Document 34.
2. The Motion sought to extend the time in which to address the discovery dispute and complete those depositions to August 3, 2020. The Motion was granted on July 1, 2020.

3. Presently, the parties are working to resolve all or part of the discovery dispute, including the entry of an Agreed Protective Order allowing for supplemental production of various documents and information at issue. The depositions will require travel, and due to various travel restrictions and other complications, including office closures and complications caused by the COVID-19 pandemic, the parties respectfully request an extension until September 30, 2020 to resolve the discovery dispute and complete the depositions.

4. The Parties affirm that this Motion is not submitted for the purposes of delay, and neither party will be prejudiced should the Court grant this Motion. Moreover, this matter is not set for trial until May of 2021 so no prejudice will be had by any party or future deadlines.

5. Parties have been working diligently on this case. Discovery has been complicated as a result of the COVID-19 pandemic.

WHEREFORE, premises considered, the Parties respectfully requests the Court grant this Motion to Extend Scheduling Order Deadline as referenced hereinabove.

Respectfully submitted,

/s/ J. Drew Houghton (with permission)

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CERTIFICATE OF SERVICE

The undersigned certifies that a true and correct copy of the foregoing was served by the Court's electronic filing system, this 22nd day of July, 2020, on counsel of record.

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